

TUVQIPÄÜÜE VÖÖ
Kevin H. Sharp

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)
)
VS.)
)
LUCRETIA NEAL)

No. 3:12-cr-00058
Chief Judge Campbell

**DEFENDANT NEAL'S MOTION FOR A BRIEF EXTENSION TO FILE
HER POSITION WITH RESPECT TO SENTENCING FACTORS**

Comes now the Defendant, Lucretia Neal, by and through undersigned counsel, Bob Lynch, Jr. and hereby moves for a brief extension of time to file her Position with Respect to Sentencing Factors.

In support of this motion, undersigned counsel would state to the court as follows:

1. The Defendant's sentencing is set for Friday, November 2, 2012 at 2:00 p.m.
2. Defendant's Position with Respect to Sentencing Factors should be filed on today's date or October 26, 2012.
3. The Defendant was prepared to file said pleading on today's date, but yesterday afternoon undersigned counsel received a revised presentence report from AUSA Adam Hersh based on new information the U.S. Probation office received at ¶ 10 of the presentence report. Undersigned counsel is in the process of investigating this matter and would request an extension to Monday, October 29, 2012 to file the Defendant's Position with Respect to Sentencing Factors.
4. Undersigned counsel is of the opinion that this extension should not affect the Defendant's sentencing date of November 2, 2012.
5. AUSA Braden Boucek has authorized undersigned counsel to state to the court that he does not oppose this brief extension.